

- (4) There was a previous protective order entered in this case for medical records however it only covered the medical records of the plaintiffs.
- (5) Counsel would like to extend the previous protective order entered in this case to cover the medical records of defendant David Ramos as well as the plaintiffs.
- (6) A copy of the proposed protective order has been attached to this motion.

WHEREFORE, Defendant Officers request that this Court to grant their motion to enter a protective order for the purposes of obtaining the medical records of the defendant, David Ramos, in the above-captioned litigation.

Respectfully submitted,

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